

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

In re: :

ALFRED NAUSSNER

Debtor(s) : Chapter 13  
: Bankruptcy No. 16-18290JKF

\* \* \* \* \*

**HEARING TO BE HELD:**

**Date: August 7, 2019**

**Time: 9:30 a.m.**

**Place: United States Bankruptcy Court**

**Courtroom #3**

**900 Market Street**

**Philadelphia, PA 19107-4295**

\* \* \* \* \*

TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. Your Movant is Scott F. Waterman, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
2. The within case was commenced by the filing of a Chapter 13 petition on 12/ 1/16.
3. This Motion to Dismiss has been filed for the following reason(s):
  - The Debtor(s) has/have failed to commence or continue making timely payments to the Trustee as required by 11 U.S.C. Section 1326.
4. For the reasons set forth herein, the Trustee believes, and therefore avers, that the within case should be dismissed.

WHEREFORE, the Movant requests that the Court, after a hearing, enter an Order dismissing this case.

Respectfully submitted,

Date: July 11, 2019

*/s/ Polly A. Langdon*

Polly A. Langdon, Esq.  
for  
Scott F. Waterman, Esq.  
Standing Chapter 13 Trustee  
2901 St. Lawrence Avenue  
Suite 100  
Reading, Pennsylvania 19606  
Telephone: (610) 779-1313